

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Thomas P. Clifford,

Plaintiff,

v.

Patterson Companies, Inc. and
Patterson Medical Supply, Inc.,

Defendants.

Case No.: 1:08-cv-00828

Honorable Joan H. Lefkow

Magistrate Judge Mason

PROPOSED SCHEDULING ORDER

The parties, having held a scheduling conference attended by Timothy J. Coffey, The Coffey Law office, P.C., Attorneys for Plaintiff, and Kathryn Mrkonich Wilson, Littler Mendelson, Attorneys for Defendant, as required by Fed. R. Civ. P. 26(f), submit the following proposed scheduling order:

- (A) The parties believe that an early settlement conference will not likely result in the disposition of the case.
- (B) The parties shall have until May 16, 2008 to make Rule 26(a)(1) disclosures.
- (C) No amendments to the pleadings and/or joinder of additional parties are anticipated. Any desired amendments may be made only on motion for good cause shown.
- (D) Non-expert discovery will close on October 15, 2008.
- (E) The cut-off date for designation of plaintiff's trial expert(s) as provided in Fed. R. Civ. P. 26(a)(2) is November 3, 2008; for defendant's trial expert(s), November 17, 2008. Depositions of the experts shall be taken within 30 days of designation. Unless otherwise stipulated, disclosure of experts will include a report fully in compliance with Rule 26(a)(2)(B).
- (F) Any motion challenging the qualifications of a designated expert must be made within 21 calendar days after the deposition of the expert or the close of discovery, whichever is earlier. If no motion is filed, the court may deem such challenges waived.

Dispositive Motions

Before a dispositive motion is filed, the parties will exchange demand and offer letters in an effort to reach resolution of the case. A status hearing will be set on a date determined by the court, approximately two weeks before the close of discovery. At this time, the parties will report on any outstanding discovery issues, as well on the possibility of settlement and whether a settlement conference with a judge may be helpful. The parties should expect to be referred to a magistrate judge for settlement discussions before filing a motion for summary judgment.

Also at this status hearing, the court will set a schedule for disposition of the case, including trial dates.

Consent to Proceed Before a Magistrate Judge

The parties do not consent to have their case proceed before a magistrate judge.

ENTER:

Date: _____

JOAN HUMPHREY LEFKOW
U.S. District Judge